

## **EXHIBIT D**

**David Denkin, et al. v. County of San Bernardino  
(Unopposed Motion to Approve FLSA Settlement)**

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**Balance** \$470,820.00  
**Invoice #** 00001  
**Invoice Date** July 16, 2017  
**Payment Terms**  
**Due Date**

**DAVID DENKIN, et al. v. COUNTY OF SAN BERNARDINO**  
**Collective Action**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
08/05/2013	MAR	Call with San Bernardino SW re class action damages	Phone Call with potential client regarding unpaid overtime issues with San Bernardino County social workers; discuss ; discuss duties of class action representative and expected timeline of litigation; discuss obtaining participation by other co-workers; memo to file.	600.00	1.0	600.00
10/11/2013	MAR	Review of "Administrative Leave" via Interoffice Memo from R. Buttram	Review of SW's "Administrative Leave" via Interoffice Memo from R. Buttram as it relates to SW's paid administrative leave and outlining the conditions required for the paid administrative leave and follow up phone call to discuss the conditions; research leave issues and whether union involvement required; review research re same; call co-counsel to discuss the same.	600.00	1.8	1,080.00
10/06/2014	MAR	Call with San Bernardino SW re 7% paycut	Phone call with social worker regarding the 7% pay cut; discuss ; discuss prior lawsuits against LA County; discuss ; memo to file; call co-counsel re same.	600.00	0.8	480.00
10/18/2014	MAR	Phone Call with re upcoming meeting with his SS	Phone call and texts with San Bernardino County SW to schedule the meeting; discuss the meeting between SEIU and SBPEA next month; discuss followup after the meeting; calendar the same for November.	600.00	0.8	480.00

12/26/2014	MAR	Phone Calls and texts with co-workers concerning the December 27th Meeting	Phone Calls and texts with San Bernardino County SW co-workers concerning the December 27th meeting; discuss location and how many co-workers are expected to attend; memo to file.	600.00	0.3	180.00
12/27/2014	MAR	Conference with SWs re unpaid OT	Meeting with San Bernardino SWs about unpaid OT, stress of caseloads that are increasing and knowledge of management of the unpaid OT forced upon the workers by the overwhelming caseloads and failure of management to address the problem; discuss their frustration by the management attitude and fear instilled by threats; discuss _____ and what they can expect if they pursue payment for the unpaid OT; discuss former co-workers who may be interested in testifying against the County; memo to file; travel to and from the meeting in Redlands, California.	600.00	9.5	5,700.00
12/31/2014	MAR	Phone Calls with AP and _____ regarding the prior LA County OT cases on behalf of SWs, forward	Phone Calls with AP and _____ regarding the prior LA County OT cases on behalf of SWs, forward _____; memo to file.	600.00	0.9	540.00
02/01/2015	MAR	Conference with _____ and SWs/time study month	Conference with _____ about the past time study month and the County's refusal to pay OT; discuss how no OT was offered until 2014; discuss County payments into the retirement system; _____; discuss other co-workers who may join lawsuit against the County; _____; memo to file; travel to and from the meeting in Redlands, California; memo to file; call co-counsel re same.	600.00	10.0	6,000.00
07/07/2015	MAR	Rancho Cucamonga meeting re OT issues	Travel to/from Rancho Cucamonga meeting with potential clients, _____; discuss unpaid overtime issues, stress leave with co-workers and how _____ is aware of unpaid OT and knowledge of co-workers caseloads that force the unpaid OT, discuss former co-workers and obtain their contact information; discuss 90% case completion, discuss _____ and how OT never paid during a time study month; discuss how SWs instructed by their SS and upper management to not record their OT in a time study month; _____; memo to file; call co-counsel re same.	600.00	6.5	3,900.00
07/09/2015	MAR	Review & Respond to Emails from	Review & Respond to Emails from Subject:	600.00	0.2	120.00

07/10/2015	MAR	Texts with Re: his average unpaid OT by week, the increased caseloads following the vote to reduce the pay which resulted in workers quitting and how the 90% completion rate cannot be met with current caseload demands	Texts with re his average unpaid OT by week, the increased caseloads following the vote to reduce the pay which resulted in workers quitting and how the 90% completion rate cannot be met with current caseload demands; discuss Riverside County's cap of 21 cases per month; discuss vacation time that is accumulated but cannot be used; discuss how the County cars have a GPS tracking unit, memo to file; call co-counsel re same.	600.00	1.0	600.00
07/20/2015	MAR	Phone Call with former employee Re: knowledge as an SS of the unpaid OT being worked by the SWs in the Rancho Cucamonga office	Phone Call with former employee Re: knowledge as an SS of the unpaid OT being worked by the SWs in the Rancho Cucamonga office; discuss GPS tracking devices and OT to be established via those records; memo to file.	600.00	0.8	480.00
07/21/2015	AEP	Case Evaluation / Complaint	Review file. Research claim for unpaid overtime under FLSA and procedural requirements for collective action complaint. Begin drafting Complaint.	500.00	4.2	2,100.00
07/22/2015	AEP	Case Evaluation / Complaint	Finish drafting Complaint. Forward to Client and attorney Richmond for review.	500.00	2.1	1,050.00
07/24/2015	MAR	Review complaint	Review complaint draft; discuss same with co-counsel.	600.00	0.5	300.00
07/25/2015	AEP	Case Evaluation / Complaint	Conference with attorney Richmond re: potential revisions to complaint.	500.00	0.2	100.00
07/26/2015	MAR	Review email on accrued vacation hours; call to to discuss the same	Review r email on accrued vacation hours; call to to discuss the same; memo to file.	600.00	0.3	180.00
07/27/2015	MAR	Conference with AP; discuss federal versus state remedies; discuss tort claims issues; discuss time card and pay stub evidence for client	Conference with co-counsel; discuss Federal versus State remedies; discuss tort claims issues; discuss time card and pay stub evidence for client to obtain and provide; memo to file; call client re same.	600.00	0.7	420.00
07/27/2015	MAR	Calls re IHSS SWs	Phone Calls with re: IHSS SWs in the San Bernardino and Rancho Cucamonga offices who may be willing to join the lawsuit; discuss their unpaid OT issues and how some SWs have left on stress leave; discuss the knowledge of the unpaid OT by the SS; memo to file.	600.00	0.9	540.00
07/27/2015	MAR	Review & Respond to Email to/from	Review & Respond to Email to/from Subject: and (a total of 15 emails)	600.00	0.5	300.00

07/27/2015	AEP	Case Evaluation / Complaint	Review email from attorney Richmond re: Complaint. Respond to same. Conference with Client and attorney Richmond re: claims and potential defenses. Research re: asserting state law labor claims against county.	500.00	1.3	650.00
07/28/2015	MAR	Research Department of Human Services website content; discuss same with AP and	Research Department of Human Services website content; discuss same with ; memo to file.	600.00	0.4	240.00
07/28/2015	MAR	Received and Reviewed July 28, 2015, 7 page fax from	Received and Reviewed July 28, 2015, 7 page fax from regarding the following: 1. Retirement Rate Contributions 2. Dept. of Aging Adult Services (DAAS) Administrative Handbook 3. HS Time Study Application 4. HS Time Study Application (continued for 4 more pages) 5. Reserve for Future Use	600.00	0.5	300.00
07/29/2015	MAR	Review & Respond to Email to/from - Other Co-Workers interested in Law Suit	Review/respond to email to/from re co-workers interested in pursuing claims for unpaid OT.	600.00	0.2	120.00
08/01/2015	MAR	Phone Call with regarding former employment that ended in	Phone call with regarding former employment that ended in as SS, discuss how OT not allowed in a TS month, and caseloads of 300 unmanageable, discuss lack of retirement contributions despite matching funds requirement; memo to file; call and co-counsel to discuss the same; memo to file.	600.00	1.2	720.00
08/01/2015	MAR	Review memo on the detailed complaints	Review memos on the detailed complaints on chain of command and supervision issues; review information on a staff meeting; review census information compiled by , review carrier work load information; call co-counsel re same; memo to file.	600.00	1.0	600.00
08/01/2015	MAR	Email to Re: Questions	Email to Re: unpaid OT.	600.00	0.2	120.00
08/01/2015	AEP	Conference with co-counsel	Conference with attorney Richmond re: case status and non-approval of overtime in time study months.	500.00	0.3	150.00
08/04/2015	AEP	Case Evaluation / Complaint	Review notes of meeting between client and attorney Richmond. Draft additional notes to file re: anticipated issues.	500.00	0.7	350.00
08/10/2015	MAR	Review Classification Specifications Report provided on the DAAS website; review duties and discuss with	Review classification specifications report provided on the DAAS website; review duties and discuss with ; obtain annual report information on the website; obtain and review TAD information; calls with and co-counsel re the same; memo to file.	600.00	1.3	780.00

08/10/2015	MAR	Texts and phone calls with Re: the diversity committee and obtain a list of co-workers	Texts and phone calls with re: the diversity committee and obtain a list of co-workers; discuss which SWs may join the lawsuit; discuss missed breaks and lunches and how his vehicle log shows time on contact visits; discuss the accumulated leave hours and whether those hours can be donated to co-workers, ; discuss a global staff indicator; memo to file; call co-counsel re same.	600.00	0.8	480.00
08/10/2015	AEP	Case Evaluation / Complaint	Review email from client attaching time study. Research re: asserting state law claims, de minimis defense, 9/80 work schedules and lunch / break periods under FLSA.	500.00	3.4	1,700.00
08/10/2015	AEP	Conference with co-counsel	Conferences with attorney Richmond re: out of classification work and impact upon SWs job duties and workload.	500.00	0.4	200.00
08/11/2015	AEP	Case Evaluation / Complaint	Email attorney Richmond re: potential defenses. Revise and finalize Complaint. Forward to Client and attorney Richmond.	500.00	0.4	200.00
08/15/2015	MAR	Texts and phone calls with on estimate of unpaid OT, discuss flex Friday issue and how SWs handle a monthly duty day	Texts and phone calls with on estimate of unpaid OT, discuss flex Friday issue and how SWs handle a monthly duty day; email co-counsel with the information and discuss the same.	600.00	0.6	360.00
08/18/2015	AEP	Case Evaluation / Complaint	Conference with Client and attorney Richmond re: potential defenses and case strategy.	500.00	0.6	300.00
08/18/2015	MAR	Conference re case strategy	Conference with co-counsel re case strategy; memo to file re same.	600.00	0.6	360.00
08/22/2015	MAR	Review Riverside Recommended Budget and changes versus Operational Impact, review Workforce Investment Act and research the same	Review Riverside Recommended Budget and changes versus Operational Impact, review Workforce Investment Act and research the same; review Federal Department of Labor information; calls with and co-counsel re the same; memo to file.	600.00	2.0	1,200.00
08/24/2015	AEP	Case Evaluation / Complaint	Review email from attorney Richmond re: revisions to complaint and . Revise complaint. Forward to Client and attorney Richmond for review.	500.00	0.7	350.00
08/24/2015	MAR	Review revised complaint	Review revised complaint; discuss same with co-counsel.	600.00	0.4	240.00

08/25/2015	MAR	Travel to /from Rancho Cucomonga; attend meeting with Denkin re: ; discuss	Travel to/from Rancho Cucomonga; attend meeting with Denkin re: ; discuss and her knowledge of the OT issues and the increased caseloads; memo to file; call co-counsel re same.	600.00	7.8	4,680.00
09/03/2015	MAR	Review the SBPEA Teamsters Local economic package; review longevity pay information; compare salary adjustment chart	Review the SBPEA Teamsters Local economic package; review longevity pay information; compare salary adjustment chart; call with re the same; memo to file.	600.00	0.6	360.00
09/16/2015	AEP	Case Evaluation / Complaint	Review email from attorney Richmond re: authorizations to be part of collective action and filing of complaint. Conference with attorney Richmond re: same. Draft authorizations and email to attorney Richmond.	500.00	0.8	400.00
09/18/2015	MAR	Phone Call with Denkin re and how the SS has	Phone Call with Denkin re issues with co-worker and how the SS has based on conversations between and the SS; discuss risk of acting as a class representative; discuss potential retaliation issues; memo to file; call co-counsel re same.	600.00	1.1	660.00
09/21/2015	MAR	; forward to AP and discuss, forward to Denkin	; forward to co-counsel and discuss, forward to Denkin for review.	600.00	0.9	540.00
09/21/2015	MAR	Phone Call with Denkin to discuss	Phone Call with Denkin to discuss ; discuss ; memo to file; call co-counsel re same.	600.00	1.1	660.00
09/21/2015	AEP	Conference with co-counsel	Conference with attorney Richmond re: opt-in form.	500.00	0.2	100.00

09/28/2015	MAR	Rancho Cucomonga meeting with SWs	<p>Travel to/from a Rancho Cucomonga meeting and attend the conference with re 90% rule and sanction against the County;</p> <p>; make a list of</p> <p>; discuss flex time</p> <p>; discuss</p> <p>; discuss</p> <p>; discuss different requirements for an SSP versus an SS; request</p> <p>; discuss</p> <p>; discuss time study months and instructions to not record OT; discuss how common knowledge by SS and upper management that high caseloads causing the SWs to routinely miss their lunch and breaks; discuss how SWs eat lunches at their desks; discuss retirement contributions; discuss</p> <p>; discuss</p> <p>; memo to file re: same; call co-counsel re same.</p>	600.00	10.0	6,000.00
10/01/2015	MAR	Review of "State of California" In-Home Supportive Services Monthly Case Load, Hours Paid & Expenditures-Total Report	Review of "State of California" In-Home Supportive Services Monthly Case Load, Hours Paid & Expenditures-Total Report; call with client and co-counsel re: same;	600.00	0.9	540.00
10/19/2015	MAR	Phone Call with re upcoming meeting with his SS	Phone Call with re upcoming meeting with his SS and how he will take notes about the threats and the failure to be fully compensated; discuss what co-workers may be willing to act as class representatives; memo to file.	600.00	0.9	540.00
11/24/2015	MAR	Review & Respond to Email to/from	Review & Respond to Email to/from Subject: Computation of Bonuses and the Contract	600.00	0.3	180.00
12/11/2015	MAR	Reviewed Interoffice Memo from Roxanne Young, MSW Re: Rancho DAAS Social Workers & Office Assistants as it relates to "Case Management Expectations"	Reviewed Interoffice Memo from Roxanne Young, MSW Re: Rancho DAAS Social Workers & Office Assistants as it relates to "Case Management Expectations"; call Denkin re same; memo to file.	600.00	0.8	480.00



12/14/2015	MAR	Phone Call with Denkin Re:	Phone call with Denkin re:  ; discuss the process after the complaint is filed; discuss  ; discuss evidence  ; memo to file; call co-counsel re the same and discuss timeline of moving forward.	600.00	0.6	360.00
12/18/2015	MAR	Phone Call with Denkin re	Phone Call with Denkin re ; discuss how ; discuss ; memo to file.	600.00	0.7	420.00
12/29/2015	MAR	Phone Call with Denkin about	Call with Denkin about ; discuss OT allowed during December and how the SWs were unable to work the offered OT; request ; memo to file; call with co-counsel re same.	600.00	1.1	660.00
12/30/2015	AEP	Case Evaluation / Complaint	Conference call with Client and attorney Richmond. [1.0]; Finalize Complaint and consent to sue. Forward to Client for review and signature. [2.0]	500.00	3.0	1,500.00
01/05/2016	GG	Review Collective Action Complaint. Telephone call with AP regarding same.	Review Collective Action Complaint. Telephone call with Alex regarding same.	700.00	1.8	1,260.00
01/05/2016	AEP	Conference with co-counsel	Conference with attorney Garrison re: complaint.	500.00	0.3	150.00
01/07/2016	AEP	Case Evaluation / Complaint	Draft Civil Case Cover Sheet, Notice of Interested Parties and Summons. Open case on CM/ECF. Initiate case and file Complaint, Summons, Civil Case Cover Sheet and Notice of Interested Parties. Email copies of filed documents to attorney Richmond.	500.00	1.2	600.00
01/08/2016	AEP	Case Management	Review notice of case assignment, notice of ADR and Judge's procedures and standing order. [0.3] Conference with Clerk re: clarification of chambers copy requirement. [0.1] Email attorney Richmond re: case status [0.2].	500.00	0.6	300.00

01/11/2016	MAR	Calls & Texts Discussing:  and much more	Calls and texts with re  ; further discussions as to   , memo to file; research issues discussed; call co-counsel to discuss the same.	600.00	1.7	1,020.00
01/12/2016	AEP	Service	Assemble service packet and forward to attorney service for service upon Defendant.	500.00	0.3	150.00
01/19/2016	MAR	Phone Call with County's Defense Attorney	Call with County's Defense Attorney re: Denkin's OT and that all OT that Denkin submitted was paid; request that the County provide the evidence; discussed how Defendant County will file a Motion to obtain evidence we possess of the unpaid OT, memo to file; call with client re same.	600.00	0.8	480.00
01/20/2016	MAR	Review of	Review of  is 35 pages that includes the following"	600.00	2.0	1,200.00

01/22/2016	MAR	Phone Call with Denkin Re:	Call with Denkin re:  ; discussed that  ; memo to file; call with co-counsel re the same.	600.00	0.7	420.00
01/22/2016	MAR	Phone Call with Re:	Call with re:  discussed threats by ; and how ; discussed ; discuss ;  , memo to file; call co-counsel re the same.	600.00	1.0	600.00
01/22/2016	MAR	Email and follow up Phone Call to AP Re: Denkin and  , memo to file	Email and follow up phone call with Denkin re:  , memo to file; call with co-counsel re same.	600.00	0.7	420.00
01/22/2016	AEP	Conference with co-counsel	Conference with attorney Richmond re: pre-filing issues.	500.00	0.2	100.00
01/26/2016	MAR	Review of January 26, 2016 Interoffice Memo From Roxanne Young, MSW	Review of January 26, 2016 Interoffice memo From Roxanne Young to Rancho DAAS Staff re Subject: Building Expansion Phase #5; call with Denkin re same.	600.00	0.6	360.00
01/28/2016	MAR	Phone Call with Denkin Re:	Phone Call with Denkin re  lack of OT in a TS month was discussed by the SW's with Young and Bennet and the need for case redistribution; memo to file.	600.00	1.1	660.00
01/29/2016	MAR	Review & Respond to Email to/from	Emails to/from re ; call with co-counsel re same.	600.00	0.6	360.00
01/29/2016	AEP	Service	Draft and file proof of service of summons.	500.00	0.4	200.00
02/02/2016	MAR	Review & Respond to Email to/from	Review & respond to emails to/from re IHSS Caseloads; call with co-counsel re same.	600.00	0.4	240.00
02/03/2016	MAR	Review & Respond to Email to/from	Review & respond to email to/from re ; call with co-counsel re same.	600.00	0.5	300.00

02/10/2016	MAR	Review of extensive 27 page SB 2030 Child Welfare Workload Study dated April 2000	Review of SB 2030 Child Welfare Workload Study dated April 2000-made detailed notes and outlined questions to discuss with	600.00	1.4	840.00
02/24/2016	MAR	Review & Respond to Email to/from	Review & Respond to Email to/from re	600.00	0.2	120.00
02/29/2016	AEP	Rule 26 Conference / Report / Disclosures	Review scheduling order. Email attorneys Kowalski and Szumiak (San Bernardino) re: request for Rule 26(f) conference.	500.00	0.3	150.00
03/01/2016	MAR	Conference with Denkin and SWs	Travel to/from conference with SWs re: management knowledge of unpaid OT during the Time Study Months; discuss ; discussed , memo to file.	600.00	8.4	5,040.00
03/01/2016	AEP	Rule 26 Conference / Report / Disclosures	Emails to and from attorney Szumiak re: request for Rule 26(f) conference.	500.00	0.2	100.00
03/04/2016	AEP	Rule 26 Conference / Report / Disclosures	Prepare for Rule 26(f) conference. Attend Rule 26(f) conference with attorneys Kowalski and Szumiak (San Bernardino).	500.00	2.3	1,150.00
03/08/2016	MAR	Review of Detailed Account of Events (10 pages) and those involved from D. Denkin from approximately December 8, 2014 thru end of the year 2015	Review of Detailed Account of Events re Denkin from approximately December 8, 2014 thru end of the year 2015; memo to file.	600.00	1.1	660.00
03/09/2016	AEP	Rule 26 Conference / Report / Disclosures	Initial draft of Rule 26 Conference Report. Forward to attorneys Kowalski and Szumiak.	500.00	5.2	2,600.00
03/14/2016	AEP	Rule 26 Conference / Report / Disclosures	Conference with attorney Richmond re: information needed for Rule 26 Conference Report [0.3]; Conference with client and attorney Richmond re: same. [0.8]; Revise Rule 26 Conference Report. Forward to attorneys Kowalski and Szumiak (San Bernardino). Finalize and file. Forward courtesy copies to attorney service for delivery to chambers. [2.9]	500.00	4.0	2,000.00
03/17/2016	MAR	Phone Call and Email with/to Re:	Phone Call and emails with/to re: , memo to file , email same to for his review.	600.00	0.6	360.00

03/17/2016	GG	Review Rule 26(A) (1) draft and telephone call with Alex regarding same.	Review Rule 26(A)(1) and telephone call with Alex regarding same.	700.00	1.1	770.00
03/17/2016	AEP	Rule 26 Conference / Report / Disclosures	Draft Rule 26 Disclosures. Conference with attorney Garrison re: same.	500.00	1.6	800.00
03/18/2016	AEP	Rule 26 Conference / Report / Disclosures	Revise and finalize Rule 26 Disclosures. Serve upon opposing counsel.	500.00	0.8	400.00
03/22/2016	MAR	Phone Call to/from	Call with that a also discussed : discussed : further discussed ; memo to file; call co-counsel and discuss the in this case and how that evidence will prove the violation of the FLSA law; research on this issues; review research; memo to file	600.00	2.0	1,200.00
03/29/2016	MAR	Emails with about	Emails with about	600.00	0.4	240.00
04/02/2016	MAR	Phone Call to/from	Phone Call to/from Subject: Phone call with discussed how has been listed on the Defense Witness List; discussed and how client expects ; discussed ; discussed Defense Witnesses and how they , memo to file	600.00	0.9	540.00
04/04/2016	MAR	Phone Call to Dave Denkin	Call with Denkin about work load and that said at the meeting that they will attempt to correct that problem and that they were told by the County that there was insufficient funds to pay the SWs for their OT work; discussed how has a calendar evidence of unpaid OT work; memo to file.	600.00	0.7	420.00

04/04/2016	MAR	Phone Call to	Call with that is afraid to come forward discussed how ; requested that ; memo to file	600.00	0.6	360.00
04/05/2016	MAR	Phone Call with ; discuss unpaid OT and obtain weekly estimate	Phone Call with ; discuss unpaid OT and obtain weekly estimate; memo to file; ; email same.	600.00	0.9	540.00
04/08/2016	MAR	Phone Call with client Re:	Phone Call with client re: ; discuss ; discuss ; memo to file; research manual re: standards for client to follow; research "TAD" information about how its' workers claim OT during a time study month.	600.00	1.1	660.00
04/11/2016	MAR	Caseload studies review	Email co-counsel re caseload studies; finalize review.	600.00	0.4	240.00
04/13/2016	AEP	Investigation / Discovery	Review email from attorney Richmond re: caseload studies. Perform internet research re: same. Respond to email from attorney Richmond with results of internet research.	500.00	1.2	600.00
04/17/2016	MAR	Emails to/from David Denkin Re: Email and	Emails with Denkin re and review of certification documentation.	600.00	0.2	120.00
04/19/2016	MAR	Phone Calls with , discuss ; discuss average OT unpaid by week; memo;	Phone Call with , discuss discuss average OT unpaid by week; memo; draft the same. ; email	600.00	0.7	420.00
04/27/2016	MAR	Phone Calls with Denkin and re the Rancho office quarterly meeting and comments by upper management	Phone Calls with Denkin and re the Rancho office quarterly meeting and , discuss and recommendations by upper management; request memo to file.	600.00	0.6	360.00

04/29/2016	MAR	Emails and call with on the meeting that discussed the County's failure to pay OT in the TS months	Emails and call with on the meeting that discussed the County's failure to pay OT in the TS months, discuss , discuss EMACS procedure with SWs reporting of their time; discuss HS Time Study policy issues; review Handbook Letter on Time Studies; discuss with forward to co-counsel; memo to file.	600.00	0.8	480.00
05/03/2016	MAR	Emails with on the ; call Denkin re the same	Emails with on the ; call Denkin re the same; memo to file; review to the Union; discuss same with ; memo to file.	600.00	1.4	840.00
05/04/2016	MAR	Email Correspondence from to M. Richmond Re:	Email Correspondence from re: respond to same.	600.00	0.3	180.00
05/05/2016	AEP	Conditional Certification	Conference with attorney Richmond re: case status and motion for preliminary certification. [0.4] Email client re: declaration required for motion for preliminary certification. [0.2] Research Central District cases re: preliminary certification of FLSA action and begin drafting motion for preliminary certification. [4.4] Email opposing counsel with LR 7-3 request to meet and confer re: motion for preliminary certification. [0.5]	500.00	5.5	2,750.00
05/05/2016	MAR	Conference with co-counsel	Conference with co-counsel re motion for preliminary certification; memo to file re same.	600.00	0.6	360.00
05/09/2016	MAR	Phone Calls and emails with and Denkin Re:	Phone Calls and emails with and Denkin re ; memo to file.	600.00	0.8	480.00
05/09/2016	AEP	Conditional Certification	Review email from opposing counsel requesting declarations prior to meet and confer conference re: plaintiff's motion for preliminary certification. Respond to same. Review reply from opposing counsel. Respond to same.	500.00	0.8	400.00
05/10/2016	MAR	Emails with AP re: SW declarations needed for the motion on Preliminary Certification	Emails with co-counsel re: SW declarations needed for the motion on preliminary certification; calls with Denkin and about needing to obtain SW support; obtain a list of potential SWs for supporting declarations; memo to file.	600.00	1.1	660.00

05/10/2016	MAR	Phone Call with , discuss ; discuss average OT unpaid by week	Phone call with , discuss ; discuss average OT unpaid by week; memo; draft ; memo to file.	600.00	0.8	480.00
05/10/2016	AEP	Conditional Certification	Emails with attorney Richmond re: declarations in support of motion for preliminary certification.	500.00	0.5	250.00
05/11/2016	MAR	Emails and calls with Re:	Emails and calls with re: ; memo to file re same; forward info to co-counsel.	600.00	0.5	300.00
05/11/2016	MAR	Phone Call with , discuss ; discuss average OT unpaid by week	Phone call with , discuss ; discuss average OT unpaid by week; memo to file re same; draft ; forward same to ew; follow up call re same.	600.00	0.9	540.00
05/12/2016	MAR	Emails and calls with Denkin, and AP re our Joint Scheduling Report; review file on prior meetings and supporting documents	Emails and calls with Denkin, and co-counsel re our Joint Scheduling Report; review file on prior meetings and supporting documents; forward information to co-counsel; conference call with defense and co-counsel re conditional pre-certification motion; memo to file; post-conference call with Denkin re same and discuss co-workers support of the lawsuit; memo to file; prepare and consent to join forms for co-workers.	600.00	1.3	780.00
05/12/2016	AEP	Conditional Certification	Conferences with client and attorney Richmond re: preliminary certification issues and deposition dates. [0.6] Prepare for LR 7-2 meet and confer with opposing counsel re: motion for preliminary certification. [1.0] Meet and confer with opposing counsel and attorney Richmond re: same. [0.2]	500.00	1.8	900.00
05/12/2016	MAR	Conference with co-counsel	Conference with co-counsel re deposition dates and certification issues; memo to file re same.	600.00	0.5	300.00
05/14/2016	MAR	Email and call with Denkin about the unpaid OT work by weekly estimate; review Report 26 Report rules; call AP re the unpaid OT average	Email and call with Denkin about the unpaid OT work by weekly estimate; review Report 26 Report rules; call co-counsel re the unpaid OT average information provided by Denkin; conference call with co-counsel and Denkin re: Report 26; review file re: same; memo to file; Review file and outline supporting SW declarations re the conditional certification motion; notation on individualized issues; review call notes re: same.	600.00	1.4	840.00
05/16/2016	MAR	Obtain MOU from file; forward to AP	Obtain MOU from file; forward to co-counsel.	600.00	0.4	240.00



05/16/2016	MAR	Phone Calls with discuss ; discuss average OT unpaid by week	Phone Calls with , discuss discuss average OT unpaid by week; memo; draft same. ; email	600.00	1.0	600.00
05/17/2016	MAR	Emails and calls with AP and Denkin Re: the memo to all SWs on the Time Study and its implication on OT payment	Emails and calls with co-counsel and Denkin re the memo to all SWs on the Time Study and its implication on OT payment; discuss supporting declarations for the motion for certification.	600.00	0.6	360.00
05/17/2016	MAR	Phone Calls with , discuss ; discuss average OT unpaid by week	Phone Calls with , discuss ; discuss average OT unpaid by week; memo to file; draft forward via email; follow up phone call to discuss the same; memo to file.	600.00	0.8	480.00
05/17/2016	AEP	Conditional Certification	Review documents provided by client re: overtime, meetings and time study months, draft declaration of David Denkin, and forward to attorney Richmond. [3.5] Conference with client and attorney Richmond re: declaration of David Denkin. [1.2] Revise declaration [1.3].	500.00	6.0	3,000.00
05/17/2016	MAR	Review Reply	Review reply re conditional certification and related pleadings; discuss same with co-counsel; memo to file re same.	600.00	3.3	1,980.00
05/18/2016	MAR	Emails with re SS instruction on OT claimed during a TS month	Emails with re SS instruction on OT claimed during a TS month; memo; call with Denkin re the same.	600.00	0.9	540.00
05/18/2016	AEP	Conditional Certification	Research equitable tolling and draft memo re: same.	500.00	1.7	850.00
05/18/2016	AEP	Case Management	Calendar potential hearing dates and deposition dates. [0.3] Email attorney Richmond re: declarations and deposition dates. [0.6]	500.00	0.9	450.00
05/18/2016	AEP	Discovery / Depositions	Review defendant's notice of deposition and document requests. Research objections to same. Begin drafting objections to defendant's notice of deposition and document requests.	500.00	2.6	1,300.00
05/19/2016	MAR	Finalize SW declarations and forward to Denkin and for and signature	Finalize SW declarations and forward to Denkin and for and signature; call to confirm	600.00	0.8	480.00

05/19/2016	MAR	Calls and emails with concerning	Calls and emails with concerning	600.00	0.5	300.00
05/19/2016	AEP	Discovery / Depositions	Finish drafting objections to defendant's notice of deposition and document requests [2.8]. Draft first set of interrogatories to defendant and first set of requests for production of documents to defendant [1.3]. Email opposing counsel re: date for plaintiff's deposition [0.1].	500.00	4.2	2,100.00
05/19/2016	MAR	Declaration preparation	Prepare, review and revise Denkin declaration re conditional certification motion; confer with co-counsel and email the same.	600.00	1.9	1,140.00
05/20/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Call with re: unpaid OT issues and co-workers decision to support the lawsuit; discuss how the process works; discuss ; discuss knowledge by SS and upper management of unpaid OT and the overwhelming caseloads; memo to file; draft the declaration of in Support of Motion for Preliminary Certification of Collective Action; forward via email; call to discuss the same; memo to file.	600.00	1.9	1,140.00
05/20/2016	MAR	Phone Calls with , discuss ; discuss average OT unpaid by week	Phone Calls with SW , Denkin and re knowledge of unpaid OT and ask for ; memos to file; draft and forward same via emails.	600.00	2.6	1,560.00
05/20/2016	AEP	Discovery / Depositions	Review email from opposing counsel re: date for plaintiff's deposition. Respond to same	500.00	0.3	150.00
05/20/2016	AEP	Conditional Certification	Review email from attorney Richmond attaching declaration of David Denkin re: conditional certification. Respond to same	500.00	0.3	150.00
05/20/2016	MAR	Received and Reviewed various Detailed Reports mailed from	Reviewed various reports mailed from re statistics, budgets, expense guidelines and other information as it relates to SWs and unpaid overtime; call expert to discuss potential damage claims established by budget discrepancies; research the same; call co-counsel to discuss; memo to file.	600.00	2.2	1,320.00
05/21/2016	MAR	Phone Calls with , discuss ; discuss average OT unpaid by week; memo; draft	Phone Calls with , and re unpaid OT and their complaints of SS directives creating more unnecessary work; discuss ; discuss ; discuss average OT unpaid by week; memo to file; draft and forward the same via emails; call co-counsel and Denkin to discuss the same;	600.00	2.5	1,500.00

05/21/2016	MAR	Phone Calls with Denkin co-workers on declarations to support the motion for certification	Phone Calls with Denkin co-workers on declarations to support the motion for certification; memo to file; draft declarations; review file notes, finalize declarations and email to Denkin, and their co-workers.	600.00	1.7	1,020.00
05/22/2016	MAR	Emails with and Denkin on the co-worker declarations; discuss fear amongst the SWs for retaliation	Emails with and Denkin on the co-worker declarations; discuss ; discuss comments made by SS and upper management; discuss , discuss month board stats, discuss the upper management knowledge of case completion rates and production request to CPRA; review file re evidence of unpaid OT issues; dictate outline of strategy re: supporting declarations for the certification motion; call expert and co-counsel to discuss the certification issues; research CPRA production request information; review documentation provided by ; memo to file.	600.00	3.0	1,800.00
05/22/2016	MAR	Continue calls with SWs in support of lawsuit; discuss average unpaid OT issues and overwhelming caseloads	Continue calls with SWs in support of lawsuit; discuss average unpaid OT issues and overwhelming caseloads; memo to file; dictate additional declarations; email same to SWs; follow up calls to confirm receipt of declarations; call with Denkin to confirm ; call co-counsel to discuss certification issues; memo to file.	600.00	2.0	1,200.00
05/23/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Call with re: status of lawsuit; discuss involvement and intention to support the lawsuit; discuss specific statements made by upper management on the issue of caseloads and unpaid OT; prepare the declaration of in Support of Motion for Preliminary Certification of Collective Action; forward via email; call to discuss the declaration; memo to file.	600.00	1.3	780.00
05/23/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Call with re: unpaid OT issues; discuss SS and upper management knowledge and how complaints of overwhelming caseloads are ignored; memo to file; prepare declaration of in Support of Motion for Preliminary Certification of Collective Action and forward same via email.	600.00	1.0	600.00
05/23/2016	MAR	Copy of	Review and receiving the following documentation:  ; call re the same; memo to file.	600.00	0.9	540.00

05/23/2016	MAR	Emails and calls with  and how it relates to the 90% rule on case completion	Emails and calls with r regarding the issue and how it relates to the 90% rule on case completion;  memo to file.	600.00	0.9	540.00
05/24/2016	MAR	Email Correspondence from  (forwarded) to M. Richmond Re: Overtime emails between	Emails with re: overtime emails between ; discuss knowledge issues; memo to file.	600.00	0.4	240.00
05/24/2016	MAR	Prepare  and Consent form	Prepare and Consent form; call to discuss the same; email to .	600.00	0.6	360.00
05/24/2016	AEP	Conditional Certification	Research motions for conditional certification under Local Rule 32-2 and draft memo re: same. Draft email to opposing counsel re: filing deadline for motion for preliminary certification, attaching stipulation and proposed order. Forward email to and attachments attorneys Garrison and Richmond for approval. Send email and attachments to opposing counsel.	500.00	4.1	2,050.00
05/25/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Prepare declaration of in Support of Motion for Preliminary Certification of Collective Action; call declarant re the same; revise and review declaration; finalize and email to declarant; memo to file.	600.00	1.1	660.00
05/25/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Prepare declaration of in Support of Motion for Preliminary Certification of Collective Action; calls and email with declarant re the same; finalize and forward to declarant for review.	600.00	1.2	720.00
05/25/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Prepare declaration of in Support of Motion for Preliminary Certification; call client re: the same; email for her review.	600.00	1.0	600.00
05/25/2016	MAR	Email Correspondence between M. Richmond and Re: EMACS and Overtime	Email with re: EMACS and Overtime; call Denkin re: same; call co-counsel re:same; memo to file.	600.00	0.8	480.00

05/25/2016	MAR	Emails and calls with co-counsel re: deadline on motion for preliminary certification	Emails and calls with co-counsel re: deadline on motion for preliminary certification; discuss preliminary research results; review the research; call Denkin to discuss the same; obtain information on OT issues; discuss current caseloads; discuss co-worker complaints to the their SS and upper management; memo to file.	600.00	1.6	960.00
05/25/2016	AEP	Case Management	Emails to and from attorneys Garrison and Richmond re: stipulation. Email opposing counsel re: filing deadline for motion for preliminary certification, attaching stipulation and proposed order. Review response and reply to same. Review email from opposing counsel re: date of plaintiff's deposition and plaintiff's objection to document requests.	500.00	0.5	250.00
05/25/2016	MAR	Emails and Forwarded Emails to/from Re: Overtime & Unpaid Overtime	Emails to/from Re: Overtime & Unpaid Overtime; call to discuss the same; memo to file.	600.00	0.5	300.00
05/26/2016	MAR	Declaration of in Support of Motion for Preliminary Certification of Collective Action	Prepare declaration of in Support of Motion for Preliminary Certification of Collective Action; call client to discuss the same.	600.00	0.8	480.00
05/26/2016	MAR	Review file and prepare for the expert conference; review Ellerd report and SB2030	Review file and prepare for the expert conference; review Ellerd report and SB2030; dictate outline of issues to discuss with the expert.	600.00	2.2	1,320.00
05/27/2016	MAR	Email Correspondence (several) between (and cc to ) Re: Forwarded to M. Richmond for review	Review emails with and ; call client to discuss the same; memo to file; call co-counsel to discuss the same.	600.00	0.6	360.00
05/27/2016	MAR	Email expert and AP to reschedule expert conference	Email expert and AP to reschedule expert conference.	600.00	0.2	120.00
05/27/2016	AEP	Conditional Certification	Review court's ex parte procedures and Judge Bernal's updated Standing Order. Conference with attorney Garrison re: same. Email opposing counsel re: request to stipulate re: filing deadline for motion for conditional certification. Review opposing counsel's response and reply to same.	500.00	0.4	200.00

05/29/2016	MAR	Declaration of  in Support of Motion for Preliminary Certification of Collective Action	Prepare declaration of Donald in Support of Motion for Preliminary Certification of Collective Action; call declarant to discuss the same; memo to file.	600.00	0.7	420.00
05/29/2016	MAR	Declaration of  in Support of Motion for Preliminary Certification of Collective Action NOT Executed/Signed	Call with re support of the lawsuit and intention to seek compensation for unpaid OT; discuss current and past caseloads and how a completion rate is required that cannot be met; discuss co-worker issues and how they are handled by the SS; discuss knowledge of upper management of the unpaid OT; Prepare declaration of in Support of Motion for Preliminary Certification of Collective Action; email same to declarant; call co-counsel re: declaration contents; memo to file.	600.00	1.5	900.00
05/30/2016	MAR	Review notice of continuance of plaintiff's deposition and request for production of records	Review notice of continuance of plaintiff's deposition and request for production of records; scan to client and review file to compile documents for the request; calls and emails with co-counsel and Denkin regarding the same.	600.00	1.0	600.00
05/31/2016	AEP	Conditional Certification	Calendar potential dates for hearing on motion for class certification. Email opposing counsel re: stipulation re: filing date of motion for preliminary certification, review opposing counsel's responses, and reply to same. Conference with opposing counsel re: stipulation re: filing date of motion for preliminary certification.	500.00	0.8	400.00
06/01/2016	MAR	Emails with Denkin and AP regarding the June memo, time logs, DAAS memos and	Emails with Denkin and co-counsel regarding the June memo, time logs, DAAS ; review MOU and discuss same; memo to file; dictate outline of evidence to produce at deposition; call with co- counsel re TS month/caseload distribution amongst SWs'; memo to file.	600.00	1.2	720.00
06/01/2016	AEP	Conditional Certification	Review email from opposing counsel re: stipulation re: hearing date for motion for preliminary certification; Conference with attorney Garrison re: same [0.2]. Revise stipulation and proposed order re: filing date of motion for preliminary certification; Email opposing counsel re: filing date and hearing date, attaching revised drafts of stipulation and proposed order; and Finalize and file stipulation re: hearing date for motion for preliminary certification [1.2].	500.00	1.4	700.00
06/03/2016	MAR	Review Denkin calendar and logs; Phone Call Client to discuss the same	Review Denkin calendar and logs; call client to discuss the same; memo to file.	600.00	1.6	960.00

06/03/2016	MAR	Email with regarding the requests; review public records emailed response	Email with regarding the requests; review public records emailed response; review emailed response.	600.00	1.0	600.00
06/03/2016	AEP	Discovery / Depositions	Review documents forwarded by attorney Richmond. Take notes re: same. Email attorney Richmond re: same. Email client and attorney Richmond re: document production and depo prep.	500.00	3.3	1,650.00
06/04/2016	MAR	Review AP email regarding Denkin's deposition and expected evidence to produce	Review co-counsel email regarding Denkin's deposition and expected evidence to produce at the same; call with Denkin to discuss the preparation; memo to file; continue review of the prior meeting notes to outline deposition evidence; call and discuss same with Denkin; memo to file.	600.00	2.7	1,620.00
06/05/2016	MAR	Emails and calls with on the and caseload capping	Emails and calls with on the responses and caseload capping , review evidence of yardsticks and caseload limits, review telecommute information and higher pay information found on the union website; call Denkin and co-counsel to discuss the same; memo to file.	600.00	1.1	660.00
06/05/2016	AEP	Discovery / Depositions	Emails to attorney Richmond re: document production and depo prep.	500.00	0.4	200.00
06/05/2016	MAR	Emails re deposition production	Emails with co-counsel re deposition production issues; research issues re the same; review the research; memo to file.	600.00	1.0	600.00
06/06/2016	MAR	Emails and calls with re retaliation issues and OA classification; memo to file	Emails and calls with re retaliation issues and OA classification; memo to file.	600.00	0.5	300.00
06/06/2016	MAR	Review file and prepare Denkin for his deposition; confer with AP re the same.	Review file and prepare Denkin for his deposition; confer with AP re the same.	600.00	2.9	1,740.00
06/06/2016	AEP	Discovery / Depositions	Review documents forwarded by attorney Richmond from client and IHSS social workers. Take notes re: same. Email Client and attorneys Garrison and Richmond re: document production at depo and depo prep. Conferences with attorney Richmond re: same. Assemble and bates number documents for production at depo. Forward to attorneys Garrison and Richmond. Upload documents to FedEx.com with formatting and delivery instructions.	500.00	2.9	1,450.00
06/07/2016	MAR	Conference with Client Denkin to complete deposition preparation; attend Deposition	Conference with Client Denkin to complete deposition preparation; attend Deposition; confer with co-counsel post deposition; travel to/from deposition location.	600.00	12.3	7,380.00

06/07/2016	GG	Conference call with David Denkin regarding his deposition.		700.00	1.2	840.00
06/07/2016	AEP	Discovery / Depositions	Review notes. Prepare for conference call with Client and co-counsel re: depo. prep. Conference call with Client and co-counsel re: same.	500.00	1.5	750.00
06/10/2016	AEP	Conditional Certification	Conference with attorney Richmond re: case status. Review "opt-in" requirement under 29 USC 216. Draft blank "opt-in" form. Forward to attorneys Garrison and Richmond.	500.00	0.5	250.00
06/14/2016	AEP	Discovery / Depositions	Review transcript of deposition of David Denkin and make outline of same [4.1]. Email attorneys Garrison and Richmond re: log books [0.2].	500.00	4.3	2,150.00
06/16/2016	MAR	Review defense email re Denkin's OT work performed at his home; forward email to Denkin	Review defense email re Denkin's OT work performed at his home; forward email to Denkin; call Denkin and discuss same; call co-counsel re: same; memo to file.	600.00	0.7	420.00
06/16/2016	MAR	Call with regarding complaints to SS and upper management levels regarding	Call with regarding complaints to SS and upper management levels regarding ; discuss and unpaid overtime claims in the lawsuit; call with Denkin to discuss information and whether ; discuss ; memo to file.	600.00	0.6	360.00
06/16/2016	GG	Draft declaration	Draft declaration of GMG ISO Preliminary Certification.	700.00	0.8	560.00
06/16/2016	GG	Draft declaration	Draft declaration of MAR ISO Preliminary Certification.	700.00	0.9	630.00
06/17/2016	MAR	Call with Denkin re co-worker and	Call with Denkin re co-worker and ; discuss and ; memo to file.	600.00	0.4	240.00
06/17/2016	GG	Draft	Electronic POS	700.00	0.3	210.00
06/17/2016	GG	Draft	Notice of Association of Counsel.	700.00	0.4	280.00
06/17/2016	AEP	Conditional Certification	Draft notice of motion and motion for conditional certification. Draft proposed order granting motion. Draft declarations of Bremer, Cerda, Chang, Corral, DeSouza and Flores. Update legal research re: conditional certification and memo re: same.	500.00	6.3	3,150.00
06/18/2016	MAR	Call with regarding	Call with regarding ; discuss prior paid leave dates ; memo to file regarding the same.	600.00	0.5	300.00



06/18/2016	MAR	Phone Call with Denkin about	Phone Call with Denkin about ; discuss with upper management; discuss statements made by co-workers to confirm they too work unpaid OT from home and ; memo to file; confer with co-counsel regarding the same.	600.00	0.7	420.00
06/18/2016	MAR	Call with re: ; discuss unpaid OT	Call with t re: ; discuss unpaid OT; memo to file.	600.00	0.4	240.00
06/18/2016	AEP	Conditional Certification	Draft memorandum of points and authorities in support of motion for conditional certification.	500.00	7.2	3,600.00
06/19/2016	AEP	Conditional Certification	Continue drafting memorandum of points and authorities in support of motion for conditional certification. Revise declarations of Garrison and Richmond. Draft declaration of Papaefthimiou. Begin drafting notice of lodgement in support of motion.	500.00	10.5	5,250.00
06/20/2016	GG	Review	Review SW decs ISO Preliminary Certification. Emails with Alex regarding same.	700.00	0.9	630.00
06/20/2016	GG	Draft	Draft proposed Class Notice	700.00	1.2	840.00
06/20/2016	AEP	Conditional Certification	Finish drafting memorandum of points and authorities and notice of lodgement in support of motion for conditional certification. Assemble exhibits. Revise proposed class notice. Revise and finalize all papers in support of motion for conditional certification. File.	500.00	10.2	5,100.00
06/22/2016	AEP	Case Management	Respond to attorney Szumiack's email re: county's document policies. Forward to Client and co-counsel. [0.7] Email client and co-counsel re: potential deposition corrections. [0.6]	500.00	1.3	650.00
06/26/2016	MAR	Emails with re: claimed OT during a TS month	Emails with re: claimed OT during a TS month.	600.00	0.3	180.00
06/27/2016	GG	Review Opposition to Motion to Certify	Review Opposition. Perform legal research. Telephone call to Alex.	700.00	5.1	3,570.00
06/27/2016	AEP	Conditional Certification	Conference with attorney Garrison re: opposition to motion for conditional certification.	500.00	0.4	200.00
06/29/2016	AEP	Conditional Certification	Review defendant's opposition to motion for conditional certification. Begin drafting reply.	500.00	4.7	2,350.00
06/29/2016	MAR	Review of Notice of Association of Counsel	Review of Notice of Association of Counsel	600.00	0.1	60.00
06/30/2016	AEP	Conditional Certification	Begin drafting reply in support of motion for conditional certification. Draft reply declaration of Denkin and reply declaration of Papaefthimiou.	500.00	12.0	6,000.00

07/01/2016	MAR	Receive signed SW declaration; call Denkin to discuss	Receive signed SW declaration; call Denkin to discuss the same.; memo to file.	600.00	0.4	240.00
07/01/2016	GG	Draft Objections	Draft objections to declarations filed in support of opposition to Motion for Certification.	700.00	3.5	2,450.00
07/01/2016	AEP	Conditional Certification	Finish drafting reply in support of motion for conditional certification and Papaefthimiou declaration. Review and revise response to defendant's objections to evidence. Draft notice of lodgement and assemble exhibits. Revise and finalize reply papers. File.	500.00	11.8	5,900.00
07/18/2016	MAR	Review email from opposing counsel re Denkin's calendars/logs	Review email from opposing counsel re Denkin's calendars/logs; email Denkin re the same.	600.00	0.2	120.00
07/20/2016	MAR	Detailed Review of the following: Consolidated Memo. of Understanding 2015-2019-Consolidated Grievance	Review MOU re: 2015-2019-Consolidated Grievance and redistributing uncovered caseloads; call Denkin and re: the same; memo to file.	600.00	1.1	660.00
07/30/2016	MAR	Call and email regarding ; discuss procedure and status of lawsuit	Call and email regarding ; discuss procedure and status of lawsuit, discuss and how other SWs are assisting with the lawsuit; discuss ; memo to file.	600.00	0.7	420.00
07/31/2016	MAR	Emails with re: SS explanation for OT in a TS month as field day	Emails with re: SS explanation for OT in a TS month as and lack of scheduled OT in a TS month so long as ; memo to file; call Denkin and to discuss the same; memo to file.	600.00	0.6	360.00
08/01/2016	AEP	Discovery / Depositions	Draft and serve second set of requests for production of documents, second set of interrogatories, and first set of requests for admission [7.6]. Review email from attorney Szumiak re: extension of expert exchange and respond to same [0.2].	500.00	7.8	3,900.00
08/03/2016	GG	Telephone call	Telephone call with Alex regarding County's offer to extend expert exchange date.	700.00	0.4	280.00
08/03/2016	AEP	Case Management	Review email from attorney Szumiack re: extension of expert exchange and discovery cutoff. Email co-counsel re: same. Respond to email from attorney Szumiak. [0.3] Draft stipulation re: extension of expert exchange and discovery cutoff. Draft proposed order re: same. Forward to attorney Szumiak. [1.7]	500.00	2.0	1,000.00
08/04/2016	AEP	Case Management	Review email from attorney Szumiak re: stipulation to extend expert exchange and discovery cutoff. Revise stipulation. File.	500.00	0.5	250.00

08/12/2016	AEP	Case Management	Review email from attorney Richmond attaching additional social worker declaration. Review declaration. Email attorney Richmond re: same.	500.00	0.3	150.00
08/15/2016	AEP	Conditional Certification	Review email from Clerk requesting pages from Plaintiff's deposition transcript. Locate pages and attach to Supplemental Notice of Lodgment. File Supplemental Notice of Lodgement.	500.00	0.5	250.00
08/18/2016	AEP	Conditional Certification	Review Order from Court requesting supplemental declarations. Conference with co-counsel re: same.	500.00	0.3	150.00
08/21/2016	MAR	Emails and calls with Denkin re: emails about the OT is a TS month	Emails and calls with Denkin re: emails about the OT in a TS month; discuss how SS confirms in a TS month versus non-TS months; memo to file.	600.00	0.5	300.00
08/22/2016	AEP	Conditional Certification	Emails to and from co-counsel re: supplemental declarations.	500.00	0.2	100.00
08/23/2016	AEP	Conditional Certification	Review notes. Emails to and from co-counsel re: supplemental declarations [0.3]. Draft supplemental Chang and DeSouza declarations. [1.5]	500.00	1.8	900.00
08/24/2016	AEP	Case Management	Emails to and from attorney Szumiak re: further continuance of expert disclosure date [0.3]. Draft declaration of Sam MacDonald and consent to sue. [0.3]	500.00	0.6	300.00
08/24/2016	AEP	Conditional Certification	Review supplemental declarations and conferences with attorney Richmond re: supplemental declarations and expert disclosures.	500.00	0.5	250.00
08/25/2016	AEP	Conditional Certification	Conferences with co-counsel re: supplemental social worker declarations re: motion for conditional certification. [0.4] Emails to and from co-counsel re: same. [0.5] Review and format signed supplemental declarations of Bremer, Cerda, Chang, Corral, Flores, Heintz, and Randle. [0.7] Draft notice of lodgment of supplemental declarations. Assemble exhibits and file. [0.8] Conference with attorney Richmond re: supplemental DeSouza declaration. Review same. Draft notice of lodgement of DeSouza declaration and notice of errata. File. [0.7]	500.00	3.1	1,550.00
08/25/2016	AEP	Case Management	Draft notice of opt-in of Lisa Heintz. File. [0.3] Emails to and from co-counsel re: proposed continuation of dates and stipulation. Conferences with co-counsel re: same. [0.4] Draft second stipulation extending expert disclosures dates and proposed order. Forward to attorney Szumiak. Revise per attorney Szumiak's comments and forward revised stipulation and proposed order to attorney Szumiak. Finalize and file stipulation and proposed order. Email proposed order to chambers. [1.4]	500.00	2.1	1,050.00
08/26/2016	AEP	Case Management	Conferences with attorney Richmond re: required expert witnesses and reports.	500.00	0.3	150.00
08/27/2016	AEP	Case Management	Conference with attorney Richmond and expert witness Bradley.	500.00	0.4	200.00

08/29/2016	GG	Telephone call	Emails and telephone calls with Alex and Megan regarding supplemental SW declarations for Reply.	700.00	0.5	350.00
08/29/2016	AEP	Case Management	Review email from attorney Richmond re: declaration and consent to sue from Sam McDonald. Review attached documents. Email attorneys Garrison and Richmond re: same.	500.00	0.3	150.00
08/30/2016	AEP	Case Management	Conference with attorney Garrison re: declaration and consent to sue from Sam McDonald. [0.1] Draft notice of opt-in of Sam McDonald. File. [0.3]	500.00	0.4	200.00
09/02/2016	MAR	Review of County of Riverside Department of Children and Aging & Adult Services, Recommended Budget for 2015/2016	Review County of Riverside Department of Children and Aging & Adult Services memos, review Recommended Budget for 2015/2016; call re: the same; memo to file.	600.00	1.3	780.00
09/03/2016	MAR	Review & Respond to Emails to/from	Review & Respond to Emails to/from re SS issues; memo to file re: same.	600.00	0.4	240.00
09/10/2016	MAR	Review defense response to second set of IROGs	Review defense response to second set of IROGs; forward copy to Denkin ; discuss list of witnesses provided in the response; discuss same; memo to file.	600.00	1.5	900.00
09/17/2016	MAR	Review client email on meeting events where unpaid OT discussed with upper management; call Denkin to confirm the conversations	Review client email on meeting events where unpaid OT discussed with upper management; call Denkin to confirm the conversations; discuss and diary evidence ; discuss calendar , discuss former work history ; memo to file.	600.00	1.1	660.00
09/19/2016	GG	Review	Review Order on Motion for Preliminary Certification. Telephone calls with co-counsel regarding same.	700.00	0.9	630.00
09/19/2016	AEP	Conditional Certification	Review order granting motion for conditional certification. Take notes re: same. Conferences with co-counsel re: order and case strategy.	500.00	1.2	600.00
09/19/2016	GG	Conference with co-counsel	Conference with AP re: order granting conditional certification.	700.00	0.5	350.00
09/26/2016	AEP	Case Management	Conferences with co-counsel re: scheduling issues. Review prior correspondence and stipulation re: extension of dates. Email opposing counsel re: continuation of dates due to conditional certification. Review response from opposing counsel refusing to stipulate re: expert exchange. Respond with argument and obtain opposing counsel's agreement re: expert exchange. Draft proposed stipulation and proposed order re: continuance and email to all counsel. Revise and file stipulation.	500.00	4.0	2,000.00

09/26/2016	AEP	Class Notice	Revise notice to class to conform with order granting conditional certification. Email proposed class notice to opposing counsel.	500.00	0.7	350.00
09/27/2016	AEP	Conditional Certification	Review portions of order granting in part motion for conditional certification for grounds for correction or appeal. Research correction of orders and right to appeal from order granting motion for conditional certification in part. Draft memo re: same. Forward to co-counsel. Conferences with co-counsel re: potential motion to correct statements in order.	500.00	4.2	2,100.00
10/04/2016	AEP	Class Notice	Draft and file notice of lodging of revised class notice.	500.00	0.7	350.00
10/06/2016	MAR	Email and call with Denkin regarding the Quaterly Meeting	Email and call with Denkin regarding the Quaterly Meeting ; memo to file; call co-counsel re the same.	600.00	0.6	360.00
10/09/2016	MAR	Phone Call with AP regarding the order on pre-certification; discuss express policy language used by the Court and whether a rehearing can address the policy issue if a standard practice rises to an express policy	Phone Call with co-counsel regarding the order on pre-certification; discuss express policy language used by the Court and whether a rehearing can address the policy issue if a standard practice rises to an express policy; discuss whether to amend the complaint to contend the unpaid overtime rises to an express policy; discuss whether to file a writ versus ask for a rehearing; confer with Denkin regarding the same; discuss depositions of upper management prior to seeking court's rehearing on the policy issue to join in other offices for pre-certification; memo to file.	600.00	1.2	720.00
10/12/2016	MAR	Conference with GMG re the expected testimony of upper management	Conference with co-counsel GMG re the expected testimony of upper management , discuss whether the complaint can be amended to obtain pre-certification for the other IHSS offices; call client to discuss the same; memo to file.	600.00	0.8	480.00
10/18/2016	MAR	Phone Call with Denkin regarding the court order on pre-certification; discuss his employment	Phone Call with Denkin regarding the court order on pre-certification; discuss his employment ; discuss the inclusion of the Rancho Cucomongo office and ; discuss need to attend a meeting with Denkin's co-workers near their office after work; review calendar for available dates; discuss potential issues with ; memo to file.	600.00	1.0	600.00
10/18/2016	AEP	Discovery / Depositions	Document review.	500.00	0.8	400.00

10/19/2016	AEP	Class Notice	Review email from attorney Richmond and message from client re: notice posted at Rancho Cucamonga office. Conference with attorney Garrison re: same. Leave message with Client re: same. Email opposing counsel re: deficiencies in notice and request for contact information of class members to perform court-ordered mailings. Conference with Client re: class notice and case status.	500.00	2.1	1,050.00
10/21/2016	AEP	Class Notice	Review email from attorney Szumiack re: deficiencies in notice and request for contact information of class members to perform court-ordered mailings. Conference with co-counsel re: same. Respond to same.	500.00	0.6	300.00
10/25/2016	MAR	Call with Denkin	Call with Denkin that SW and will sign declaration that no OT paid in a TS month in ; discuss deposition of SS and ; memo to file.	600.00	0.5	300.00
10/25/2016	AEP	Discovery / Depositions	Review emails from attorney Szumiack re: depositions of opt-ins and requested second deposition of plaintiff Denkin. Research re: same. Email attorney Szumiack re: depositions of opt-ins and requested second deposition of plaintiff Denkin.	500.00	1.2	600.00
10/25/2016	AEP	Class Notice	Conferences and emails with co-counsel re: ex parte application to require mailing of class notice and defendant's requests for deposition dates. [0.4] Review email from attorney Szumiack re: deficiencies in notice and request for contact information of class members to perform court-ordered mailings. Research re: same. Draft email with notice of ex parte hearing to require mailing of class notice and related relief. Forward opt-in form to opposing counsel. [1.5]	500.00	1.9	950.00
10/25/2016	MAR	Several Texts back and Forth with Re: Several Items inc.	Call with re meeting; discuss staff issues and ; memo to file.	600.00	0.4	240.00
10/26/2016	MAR	Review file to prepare for conference with potential class members	Review file to prepare for conference with potential class members; call Denkin and discuss strategy ; memo to file; call co-counsel AP and discuss the same; review posted notice and discuss the same; memo to file.	600.00	2.5	1,500.00

10/26/2016	AEP	Class Notice	Draft application for ex parte hearing of motion for order requiring proper notice. Draft memorandum of points and authorities, declaration of Alex Papaefthimiou, proposed order, and notices of lodging in support of same. Assemble exhibits to notice of lodgement. Draft notice of lodging of proposed motion for order requiring proper notice. Draft proposed motion for order requiring motion, memorandum of points and authorities and proposed order in support of same. File ex parte application and supporting papers.	500.00	9.3	4,650.00
10/27/2016	MAR	Conference with co-workers to discuss status of litigation	Travel to/from San Bernardino County re conference with co-workers to discuss status of litigation; review court order and with meeting attendees; discuss issues with ; memo to file; post meeting conference with co-counsel AP; memo to file.	600.00	10.5	6,300.00
10/27/2016	AEP	Class Notice	Review defendant's opposition to application for ex parte hearing of motion for order requiring proper notice and motion for order requiring proper notice. [0.3] Conferences with co-counsel re: defendant's opposition. [0.4] Begin drafting reply in support of application for ex parte hearing of motion for order requiring proper notice and motion for order requiring proper notice. [5.8]	500.00	6.5	3,250.00
10/28/2016	MAR	Review response and public disclosure information provided by Department of Public Social Services	Review response and public disclosure information provided by Department of Public Social Services showing caseloads and budget formulas; review and discuss with the County Expense Claim Ledger System documents; review and discuss with the Labor Management Task Force Agenda for 10/24/16; memo to file.	600.00	1.8	1,080.00
10/28/2016	AEP	Class Notice	Finish drafting reply in support of application for ex parte hearing of motion for order requiring proper notice and motion for order requiring proper notice. [1.2] File and serve reply. Assemble courtesy copies and email to attorney service with instructions to deliver to chambers. [0.2] Conferences with co-counsel re: ex parte application and case strategy. [0.3]	500.00	1.7	850.00
10/30/2016	MAR	Review all pleadings concerning our ex parte application for an Order Requiring Compliance with Notice to Plaintiff Class;	Review all pleadings concerning our ex parte application for an Order Requiring Compliance with Notice to Plaintiff Class; review Court's pre-certification order; review authorities cited in the pre-certification order; dictate memo for argument at upcoming hearing.	600.00	2.5	1,500.00

10/31/2016	MAR	Travel to/from hearing on ex parte application for an Order Requiring Compliance with Notice to Plaintiff Class	Travel to/from hearing on ex parte application for an Order Requiring Compliance with Notice to Plaintiff Class; argue same; obtain ruling; call co-counsel to discuss the ruling; call Denkin and to discuss the ruling; memo to file.	600.00	7.4	4,440.00
10/31/2016	AEP	Class Notice	Conferences with co-counsel re: hearing on client's ex parte application for order requiring proper notice.	500.00	0.5	250.00
11/02/2016	AEP	Class Notice	Review orders granting client's ex parte application for order requiring proper notice. Conference with co-counsel re: same.	500.00	0.3	150.00
11/03/2016	AEP	Class Notice	Conference with attorney Szumiack re: compliance with court's order granting client's ex parte application for order requiring proper notice. Recommend that notice be performed by plaintiff's counsel or third-party administrator. Conference with attorney Garrison re: same.	500.00	0.2	100.00
11/05/2016	MAR	Review and complaints against	Review and complaints against ; request additional information about ; email about individual issues that will not be resolved in the unpaid OT case; memo to file.	600.00	0.6	360.00
11/07/2016	AEP	Class Notice	Review email from attorney Szumiack re: defendant's desire to perform mailing and contact information for members of the plaintiff class. [0.2] Conference with attorney Garrison re: same. [0.3]. Email attorney Szumiack re: defendant's desire to perform mailing and contact information for members of the plaintiff class, and confer re: request for information re: defendants' provision of notice. [1.5]	500.00	2.1	1,050.00
11/08/2016	MAR	Conference call with opposing counsel regarding 3rd party mailings	Conference call with opposing counsel regarding 3rd party mailings, discuss which administrator to use and if a stipulation and order will be needed; discuss tolling issue versus statute of limitations to claims, memo to file; call Denkin and discuss current posting, review emailed pictures and forward same to co-counsel; conference with co-counsel on current posting and the workers fears of retaliation, discuss threats by supervisors to keep workers from joining the suit; memo to file re: same.	600.00	1.0	600.00
11/08/2016	AEP	Class Notice	Research right of both plaintiff and defendant to contact putative class members during opt-in period. Email co-counsel re: same. [1.4] Conference with co-counsel and opposing counsel re: tolling and mailing of notice to plaintiff class, and agree to mailing by third-party administrator. [0.2].	500.00	1.6	800.00
11/09/2016	AEP	Class Notice	Review stipulation from attorney Szumiack re: mailing of notice to plaintiff class by third-party administrator. Revise and email to all counsel.	500.00	0.4	200.00



11/13/2016	MAR	Review staffing/caseload historical information; review DAAS IHSS funding history data comparing allocations to expenditures; review proposed budget	Review staffing/caseload historical information; review DAAS IHSS funding history data comparing allocations to expenditures; review proposed budget information compared to adopted budget; review California Public Records request by Bremer; review mandated client services information that resulted with an increased workload re: IHSS assessments and managed health care plans; email to clarify facts provided in the data and chart information; respond to ; continue to review the supporting documentation.	600.00	2.1	1,260.00
11/14/2016	MAR	Reviews Document Re: The Results from the Compensation Study-Approved Salary Changes	Review document on the results from the Compensation Study-Approved Salary Changes; call Bremer re the same; memo to file the same.	600.00	0.4	240.00
11/15/2016	MAR	Email from Re: ,  "	Review email from re: Rancho office policies and caseloads issues; call to discuss the same; memo to file.	600.00	0.6	360.00
11/16/2016	AEP	Class Notice	Review order granting stipulation re: mailing of notice to plaintiff class by third-party administrator. Email third-party administrator (Sempluris) re: notice to be provided, attaching list of class members, approved form of notice, opt-in form, and order authorizing mailing by third-party administrator. Review emails from third-party administrator (Sempluris) re: notice to be provided. Per administrator's request, forward Word versions of notice and opt-in form.	500.00	1.2	600.00
11/17/2016	AEP	Class Notice	Review emails from third-party administrator (Sempluris) and attached revised / reformatted notice and opt-in forms. Email administrator and all counsel re: required revisions and corrections to revised / reformatted notice and opt-in forms.	500.00	0.6	300.00
11/30/2016	AEP	Discovery / Depositions	Review email from attorney Szumiak re: request for second deposition of plaintiff Denkin. Respond to same.	500.00	0.5	250.00
12/01/2016	AEP	Discovery / Depositions	Review email from attorney Szumiak re: request for second deposition of plaintiff Denkin. Respond to same.	500.00	0.4	200.00
12/06/2016	AEP	Case Management	Review opt-in forms received by class members. Cross-reference with opt-ins already on file. Verify spelling of names with County records. Draft and file notice of filing of consents to sue.	500.00	0.4	200.00

12/09/2016	MAR	Phone Calls with Denkin and Re:	Phone Calls with Denkin and re the ; request a copy of ; discuss how ; discuss opt-in status and which co-workers have joined so far; discuss ; discuss ; memo to file re: same.	600.00	1.1	660.00
12/10/2016	MAR	Texts with r about	Texts with r about his ; call and discuss same with AP and GMG; memo to file.	600.00	0.3	180.00
12/12/2016	MAR	Email correspondence sent from D. Denkin to M. Richmond - forwarding an email from Robert Bennett to entire Staff Re: Overtime	Email correspondence with Denkin; review an email from Robert Bennett to entire Staff re: overtime; call with Denkin re same; memo to file.	600.00	0.6	360.00
12/23/2016	AEP	Case Management	Review opt-in forms received by class members. Cross-reference with opt-ins already on file. Verify spelling of names with County records. Draft and file notice of filing of consents to sue. [0.4] Review filed consents to sue and declarations in support of motion for conditional certification. Draft opt-in spreadsheet. [0.4]	500.00	0.8	400.00
01/09/2017	GG	Telephone call	Telephone call with David regarding Lillian Angular.	700.00	0.5	350.00
01/10/2017	AEP	Case Management	Review email from attorney Richmond re: opt-ins. Respond to same. Conference with attorney Richmond re: case status and strategy.	500.00	0.5	250.00
01/13/2017	AEP	Case Management	Review opt-in forms received by class members. Cross-reference with opt-ins already on file. Verify spelling of names with County records. Draft and file notice of filing of consents to sue.	500.00	0.4	200.00
01/20/2017	AEP	Case Management	Review opt-in forms received by class members. Cross-reference with opt-ins already on file. Verify spelling of names with County records. Draft and file notice of filing of consents to sue. [0.4] Email co-counsel re: opt-ins. [0.3]	500.00	0.7	350.00
01/25/2017	AEP	Discovery / Depositions	Review documents provided by client. Index and take notes re: same. Bates stamp and assemble documents for production (P00321-00752). Draft cover letter to accompany documents. Send cover letter and USB drive containing documents to opposing counsel. Email all counsel re: same.	500.00	3.9	1,950.00
01/30/2017	GG	Telephone call	Telephone calls with Alex regarding the County requesting a second deposition of David. Perform legal research in regard to same.	700.00	1.1	770.00

01/30/2017	MAR	Review of the County of San Bernardino, Human Services System (HSS) Standards for Employee Conduct and Phone Call to my Client	Review of the County of San Bernardino, Human Services System (HSS) Standards for Employee Conduct and Phone Call to my Client to discuss this in detail	600.00	1.6	960.00
01/30/2017	AEP	Discovery / Depositions	Conference with attorney Garrison re: second deposition of David Denkin and case strategy.	500.00	0.6	300.00
02/10/2017	MAR	Extensive Review of 2014-2017 County of San Bernardino and San Bernardino Public Employees Association Consolidated Memorandum of Understanding	Extensive Review of 2014-2017 County of San Bernardino and San Bernardino Public Employees Association Consolidated Memorandum of Understanding Administrative Services; Clerical; Craft, Labor & Trades; Management; Professional; Supervisory; Supervisory Nurses; and Technical & Inspection Units (138+ pages-including detailed reports, tables, appendixes, etc.)	600.00	3.3	1,980.00
02/10/2017	MAR	Phone call to Client to discuss my review of the County of San Bernardino and the San Bernardino Public Employees Association Consolidated Memorandum of Understanding 2014-2017	Phone call to Client to discuss my review of the County of San Bernardino and the San Bernardino Public Employees Association Consolidated Memorandum of Understanding 2014-2017	600.00	1.8	1,080.00
02/15/2017	AEP	Discovery / Depositions	Email attorney Szumiak re: opt-in depositions, second depositions of David Denkin, depositions of defendants' employees, and scheduling.	500.00	0.4	200.00
02/20/2017	AEP	Case Management	Verify upcoming dates. Email co-counsel re: scheduling, depositions, expert designations, opt-in status, mediation, and potential continuance.	500.00	0.8	400.00
02/22/2017	MAR	Emails with Denkin re depositions	Emails and calls with Denkin re list of deponents and expected testimony; call co-counsel re same.	600.00	1.1	660.00

02/22/2017	MAR	Reviewed an Interoffice Memo from the County of San Bernardino DAAS Supervisors to the DAAS IHSS Staff (cc: Roxanne Young, DD and Rob Bennett, DM)Re; Case Load Distribution and unpaid OT. After review of Memo, phone calls to discuss in greater detail with	Reviewed an Interoffice Memo from the County of San Bernardino DAAS Supervisors to the DAAS IHSS Staff (cc: Roxanne Young, DD and Rob Bennett, DM)Re; Case Load Distribution and unpaid OT. After review of Memo, phone calls to discuss in greater detail with D. Denkin	600.00	1.6	960.00
02/22/2017	AEP	Discovery / Depositions	Conference with attorney Richmond re: deponents and anticipated testimony.	500.00	0.3	150.00
02/23/2017	AEP	Discovery / Depositions	Review notices of deposition of David Denkin and Saman Pour Sanne. Conference with attorney Garrison re: depositions. Check calendar. Draft notices of deposition of Teresa Alarcon, Amy Shakelford, Deborah Farlow, Robert Bennett, Roxanne Young, and Debra Billings-Merlos.	500.00	1.9	950.00
02/23/2017	AEP	Case Management	Review opt-in forms received by class members. Cross-reference with opt-ins already on file. Verify spelling of names with County records. Draft and file notice of filing of consents to sue.	500.00	0.4	200.00
02/23/2017	MAR	In preparation for depositions, reviewed several pages of emails from County Supervisory Staff to IHSS Staff regarding Overtime (denied, not approved, unpaid) and phone call to Client to discuss all emails sent between December 8, 2014 and December 21, 20	In preparation for depositions, reviewed several pages of emails from County Supervisory Staff to IHSS Staff regarding Overtime (denied, not approved, unpaid) and phone call to Client to discuss all emails sent between and from:	600.00	1.2	720.00
02/24/2017	AEP	Case Management	Conference with attorney Szumiak re: mediation, continuance of dates, and deposition scheduling. Emails to and from attorney Szumiak re: mediator.	500.00	0.5	250.00

02/24/2017	MAR	Review of the SBPEA Teamsters Local 1932 County Comprehensive Economic Package dated October 27, 2015 and follow up phone calls to discuss in greater detail with D. Denkin and	Review of the SBPEA Teamsters Local 1932 County Comprehensive Economic Package dated October 27, 2015 and follow up phone calls to discuss in greater detail with D. Denkin	600.00	1.3	780.00
02/24/2017	MAR	In preparation for Depositions, reviewed several hundred pages of detailed daily notes from schedules from the dates of thru and then called Clients to discuss in greater detail	In preparation for Depositions, reviewed several hundred pages of daily notes from schedules from the dates of thru and then called Clients to discuss in greater detail	600.00	2.5	1,500.00
02/27/2017	MAR	In preparation for Depositions, reviewed several hundred pages of detailed daily notes from schedules from the dates of thru and then called Clients to discuss in greater detail	In preparation for Depositions, reviewed several hundred pages of daily notes from schedules from the dates of thru and then called Clients to discuss in greater detail	600.00	2.5	1,500.00
02/27/2017	MAR	Research and reviewed SBD and LA County Claims, County Expenses Claim Ledger System, California Public Records Act Request, County Counsel for preparation for depositions on	Research and reviewed SBD and LA County Claims, County Expenses Claim Ledger System, California Public Records Act Request, County Counsel for preparation for upcoming depositions	600.00	2.2	1,320.00
02/28/2017	GG	Telephone call	Telephone call with Alex regarding mediation dates.	700.00	0.4	280.00
02/28/2017	AEP	Case Management	Conference with attorney Szumiak re: mediation, continuance of dates, and deposition scheduling. [0.8] Review and respond to email from attorney Szumiak re: same. [0.1]	500.00	0.9	450.00

02/28/2017	AEP	Discovery / Depositions	Conference with attorney Garrison re: mediation dates and settlement strategy.	500.00	0.4	200.00
03/01/2017	MAR	Phone Call to David Denkin to extensively discuss Depo	<p>Phone Call to David Denkin to extensively discuss Depo, SW Co-Workers, , etc.</p> <p>Review and respond to email from attorney Szumiak re: deposition of Bob Bennett. [0.1] Review and revise stipulation to continue dates. [0.4]</p> <p>In preparation for Depos, reviewed the following Documents and Reports:</p> <p>Review of previous notes for the County of San Bernardino SW's, CPS, Allison Lucky, their Union and unpaid Overtime</p> <p>Review calendar and notices of deposition. Email attorney Szumiak re: deposition scheduling and document production. Conference with attorney Szumiak re: same.</p> <p>Email co-counsel re: deposition schedule and confirmation of availability. [0.7] Review and organize emails and documents for evidence re: upcoming depositions. [0.9] Draft meet and confer letter to attorney Szumiak re: defendant's initial disclosures, discovery responses, and document production [2.7] Draft notice of deposition of Liz Rodriguez Godara, and amended notices of deposition of Teresa Alarcon, Amy Shakelford, Deborah Farlow, Roxanne Young, and Debra Billings-Merlos. Email all counsel with deposition schedule, attaching notices of deposition. [1.3]</p>	600.00	0.8	480.00
03/02/2017	AEP	Case Management		500.00	0.5	250.00
03/02/2017	MAR	In preparation for Depos, reviewed the following Documents and Reports:		600.00	5.3	3,180.00
03/03/2017	MAR	Review of previous notes for the County of San Bernardino SW's, CPS, their Union and unpaid Overtime		600.00	0.6	360.00
03/04/2017	AEP	Discovery / Depositions		500.00	1.5	750.00
03/05/2017	AEP	Discovery / Depositions		500.00	5.6	2,800.00

03/06/2017	AEP	Discovery / Depositions	Conference with attorney Richmond re: deposition scheduling. [0.2] Review and respond to emails from attorney Szumiak re: deposition scheduling. [0.3]	500.00	0.5	250.00
03/07/2017	AEP	Discovery / Depositions	Prepare for meet and confer with attorney Szumiak re: depositions and document production. Meet and confer with attorneys Szumiak and Riss re: same.	500.00	0.8	400.00
03/07/2017	MAR	Emails on late consents	Emails with Denkin and co-counsel re late consents produced after the deadline	600.00	0.3	180.00
03/08/2017	AEP	Discovery / Depositions	Draft objections to the notice of deposition of David Denkin. [0.5] Conference with client re: case status, depositions and Bob Bennett. [0.5] Review email from attorney Szumiak re: Gondara deposition. Draft notices of deposition of Bob Bennett and Liz Gondara. Email to opposing counsel. [0.4] Conference call with client and co-counsel re: preparation for second deposition of David Denkin. [1.2]	500.00	2.6	1,300.00
03/09/2017	AEP	Discovery / Depositions	Travel to and from Riverside. Meet with client before deposition. Defend deposition.	500.00	8.5	4,250.00
03/10/2017	AEP	Discovery / Depositions	Review and respond to emails from attorney Szumiak re: defendant's document production. [0.2] Review and revise draft protective order. Email attorney Szumiak re: same. [0.3]	500.00	0.5	250.00
03/12/2017	AEP	Discovery / Depositions	Conference with client re: depositions of defendant's employees / supervisors [0.7] Email co-counsel re: contact information. [0.2].	500.00	0.9	450.00
03/13/2017	AEP	Discovery / Depositions	Travel to Riverside. [2.2] Review recently produced documents. Prepare for depositions of Teresa Alarcon, Amy Shackelford, Roxanne Young, and Debra Billings Merlos. [10.5]	500.00	12.7	6,350.00
03/14/2017	AEP	Discovery / Depositions	Travel to and from depositions. Take depositions of Teresa Alarcon and Amy Shackelford. [9.0] Conference with client re: depositions [0.7]. Prepare for depositions of Roxanne Young and Debra Billings-Merlos [2.3]	500.00	12.0	6,000.00
03/15/2017	AEP	Discovery / Depositions	Travel to and from depositions Take depositions of Roxanne Young and Debra Billings-Merlos. [7.3] Conferences with client and co-counsel re: deposition testimony. [0.7] Prepare for meeting with client. [0.6]	500.00	8.6	4,300.00
03/16/2017	AEP	Discovery / Depositions	Meet with client [1.0]. Travel to Camarillo [2.5].	500.00	3.5	1,750.00
03/20/2017	AEP	Discovery / Depositions	Review documents recently produced by defendant. [1.5] Email attorneys Richmond and Garrison re: deposition schedule. [0.2] Conference with co-counsel re: depositions and case status [0.3] Travel to Riverside [2.7]. Prepare for deposition of Deborah Farlow [2.5].	500.00	7.2	3,600.00

03/20/2017	MAR	Reviewed Special Interrogatories in Denkin case and phone call to discuss with Client as it relates to the following other Plaintiff's	Reviewed Special Interrogatories in Denkin case and phone call to discuss with Client as it relates to the following other Plaintiff's:	600.00	2.7	1,620.00
03/20/2017	MAR	Reviewed Special Interrogatories in Denkin case and Phone Call to to discuss the matter in detail	Reviewed Special Interrogatories in Denkin case and Phone Call to to discuss the matter in detail	600.00	1.1	660.00
03/20/2017	MAR	Reviewed Special Interrogatories in Denkin case and Phone Call to to discuss the matter in detail	Reviewed Special Interrogatories in Denkin case and Phone Call to to discuss the matter in detail	600.00	0.8	480.00
03/21/2017	AEP	Discovery / Depositions	Travel to deposition. Take deposition of Deborah Farlow. [3.8] Travel to Camarillo. [2.2]	500.00	6.0	3,000.00
03/22/2017	MAR	Emails with Denkin re SW depositions	Emails and calls with Denkin and SWs re their set depositions and revised schedules; memo to file	600.00	1.1	660.00
03/22/2017	MAR	Reviewed Special Interrogatories in Denkin case and phone call to discuss with Client as it relates to the following other Plaintiff's:	Reviewed Special Interrogatories in Denkin case and phone call to discuss with Client as it relates to the following other Plaintiff's:	600.00	2.4	1,440.00



03/22/2017	MAR	Reviewed Special Interrogatories in Denkin case and Phone Calls to discuss their testimony with each of the following Plaintiffs	Reviewed Special Interrogatories in Denkin case and Phone Calls to discuss their testimony with each of the following Plaintiffs:	600.00	3.6	2,160.00
03/22/2017	MAR	Reviewed Request for Production of Documents & Tangible Things (Set No. One) in Denkin case and follow up Phone Call to David Denkin	Reviewed Request for Production of Documents & Tangible Things (Set No. One) in Denkin case and follow up Phone Call to David Denkin to discuss the matter in detail	600.00	0.9	540.00
03/23/2017	AEP	Discovery / Depositions	Review late received opt-ins of Lauve and Mariona. Verify employment and names with County records. Email attorney Szumiak re: stipulation to allow late opt-ins. [0.3] Conference with attorney Szumiak re: deposition schedule, late opt-ins, and discovery responses. [0.2] Review emails from attorney Richmond re: depositions of opt-in plaintiffs. Update calendar. Scan notices of deposition. Email co-counsel re: deposition schedule, attaching notices of deposition. [0.8]	500.00	1.3	650.00
03/24/2017	AEP	Discovery / Depositions	Conferences and emails with attorney Richmond re: deposition schedule. Email attorney Szumiak re: same. [0.7] Review messages from client. Review documents memorializing meetings. Email attorney Szumiak re: production of notes and minutes. [1.0]	500.00	1.7	850.00
03/26/2017	GG	Meet with clients.	Travel to Rancho Cucamonga. Meet with clients. Return travel.	700.00	6.7	4,690.00
03/26/2017	AEP	Discovery / Depositions	Email co-counsel re: deposition testimony to date and memo re: issues for depositions of Liz Gondara and Robert Bennett. Conference with attorney Garrison re: same and meeting with clients. Organize deposition exhibits and email to co-counsel.	500.00	3.2	1,600.00
03/26/2017	GG	Conference with co-counsel	Conference with AP re: issues for depositions.	700.00	0.3	210.00
03/27/2017	GG	Review depositions	Review depositions of Debra Billings-Merlos, Roxanne Young and Deborah Farlow.	700.00	10.3	7,210.00

03/27/2017	AEP	Case Management	Conferences and emails with co-counsel re: deposition scheduling.	500.00	0.9	450.00
03/27/2017	MAR	Emails with Denkin on deposition notices	Emails with Denkin on the depositions notices served by the County; request that he confirm the SWs availability for the noticed dates; follow up calls; discuss same with co-counsel; schedule preparation meetings; memo to file.	600.00	1.4	840.00
03/28/2017	AEP	Discovery / Depositions	Email attorney Szumiak re: deposition scheduling. Review documents and email attorney Garrison re: deposition prep., attaching additional exhibits.	500.00	3.0	1,500.00
03/29/2017	GG	Deposition	Travel to and take the depositions of Liz Rodriguez and Bob Bennett. Return travel.	700.00	10.0	7,000.00
03/29/2017	AEP	Discovery / Depositions	Conferences with attorney Garrison before, during and after depositions re: depositions. [1.0] Review produced documents for emails to/from client deponents, records re: client deponents, and employee files of client deponents. Forward to attorney Garrison. Conference with attorney Garrison re: client depositions. [3.5] Draft and email objections to notices of deposition of De Souza and Heintz. [0.9]	500.00	5.4	2,700.00
03/30/2017	GG	Prepare for depositions	Prepare for depositions of Liz Rodriguez and Bob Bennett.	700.00	10.5	7,350.00
03/30/2017	GG	Depositions	Travel to depositions location. Meet with Carol DeSousa. Attend DeSousa deposition. Meet with Lisa Hientz. Attend Hientz deposition. Return travel.	700.00	9.8	6,860.00
03/30/2017	GG	Depositions	Pre deposition teleconference with Lupe Cuerda and Cherrie Harmon	700.00	0.5	350.00
03/30/2017	GG	email	Email format my depo notes and email to Alex.	700.00	0.2	140.00
03/30/2017	AEP	Discovery / Depositions	Travel from Camarillo to Riverside. [2.3] Conferences with attorney Garrison re: deposition testimony and case strategy. [0.7] Draft and email objections to notices of deposition of Harmon, Cerda, Arechiga, Muni, Ruiz and Pour-Sannae [1.0] Prepare to defend depositions of Harmon and Cerda. Review documents. [1.8]	500.00	5.8	2,900.00
03/31/2017	AEP	Discovery / Depositions	Travel to deposition. Defend depositions of Harmon and Cerda. [6.5] Travel from Riverside to Camarillo. [2.5]	500.00	9.0	4,500.00
04/02/2017	GG	Deposition	Travel to Rancho Cucamonga to meet with Angie Archiega. Meet with Angie. Return travel.	700.00	6.2	4,340.00
04/03/2017	GG	Deposition	Travel to Riverside. Meet with Angie Archiega. Attend Angie's deposition. Meet with Carmen Muni. Attend Carmen's deposition. Return travel.	700.00	11.0	7,700.00
04/04/2017	MAR	Text searching program with	Review text content re: unpaid OT issues and case overloads; discuss same with co-counsel; dictate outline of issues for evidence to produce to defense.	600.00	2.2	1,320.00

04/11/2017	AEP	Discovery / Depositions	Email attorney Szumiak re: discovery extension. [0.1] Begin drafting responses to interrogatories upon opt-in plaintiffs. [1.8]	500.00	1.9	950.00
04/12/2017	MAR	Emails re mediation date	Emails to SWs re mediation date and location; request they attend for same and respond to calls and texts re process; memo to file.	600.00	0.6	360.00
04/13/2017	AEP	Discovery / Depositions	Finish drafting responses to interrogatories upon opt-in plaintiffs and forward to co-counsel [3.3]. Draft and serve objections to demand for production of documents to plaintiff David Denkin [0.8].	500.00	4.1	2,050.00
04/17/2017	AEP	Settlement / Mediation	Begin drafting mediation brief.	500.00	3.3	1,650.00
04/17/2017	MAR	Emails with SWs	Emails with SWs to confirm declaration of unpaid OT that was made by the prior court filing; discuss damage issues; memo to file.	600.00	0.9	540.00
04/18/2017	AEP	Settlement / Mediation	Conference call with co-counsel and attorney Szumiak re: mediation (covered by mediation privilege) [0.3]. Conferences with co-counsel re: settlement. [0.4]	500.00	0.7	350.00
04/18/2017	AEP	Discovery / Depositions	Revise and finalize responses to interrogatories upon opt-in plaintiffs. Conferences and emails with attorney Richmond re: same. Assemble for production and serve via email.	500.00	4.5	2,250.00
04/18/2017	MAR	Emails re caseload increas	Emails with SWs with proof of increased caseloads; discuss retaliation issues; discuss with co-counsel re same.	600.00	0.8	480.00
04/19/2017	GG	Deposition	Review and revise mediation brief. Summarize Bennett and Rodriguez depositions and send cites to Alex. Telephone call with Alex regarding same.	700.00	7.1	4,970.00
04/19/2017	AEP	Settlement / Mediation	Finish drafting mediation brief. Assemble exhibits. Forward to co-counsel for review. Revise and finalize.	500.00	6.6	3,300.00
04/20/2017	AEP	Settlement / Mediation	Travel to Orange. [2.0]. Conferences with co-counsel and mediation prep. [1.3]	500.00	3.3	1,650.00
04/21/2017	GG	Phone call with client after mediation.	Telephone call with client regarding mediation.	700.00	0.4	280.00
04/21/2017	GG	Travel to and attend mediation. Return travel.		700.00	12.0	8,400.00
04/21/2017	AEP	Settlement / Mediation	Travel to mediation. Meet with co-counsel prior to mediation. Attend mediation. Draft memorandum of settlement. [8.0] Travel to Camarillo. [2.5]	500.00	10.5	5,250.00
04/21/2017	MAR	Settlement/Mediation	Travel to and attend mediation; return travel; call with Denkin post-mediation; discuss settlement terms; memo to file; text co-counsel re start date issues on class members.	600.00	12.8	7,680.00

04/25/2017	AEP	Settlement / Mediation	Draft stipulation to allow late filing of consents to join and proposed order. Scan and assemble exhibits. [1.0] Draft notice of settlement. Scan and assemble exhibit. [0.5] Email proposed stipulation and notice of settlement to all counsel. [0.1]	500.00	1.6	800.00
04/26/2017	AEP	Settlement / Mediation	Review email from attorney Szumiak re: notice of settlement and opt-in stipulation. Conference with attorney Garrison re: same. [0.3] Revise notice of settlement and opt-in stipulation. Forward to all counsel. [0.6]	500.00	0.9	450.00
04/27/2017	AEP	Settlement / Mediation	Review email from attorney Szumiak approving notice of settlement and opt-in stipulation. File notice of settlement and opt-in stipulation.	500.00	0.4	200.00
04/27/2017	AEP	Case Management	Conference with client re: case status.	500.00	0.2	100.00
04/27/2017	MAR	Emails re:	Emails with Denkin and co-counsel re: ; discuss 90% completion rate issues and list of documented grievances; discuss same with co-counsel; memo to file.	600.00	1.0	600.00
04/28/2017	GG	Telephone call	Telephone call with David regarding SW questions on MOU approval and expected payment date.	700.00	0.5	350.00
04/28/2017	AEP	Case Management	Conference with client re: case status.	500.00	0.2	100.00
04/29/2017	GG	Telephone call	Telephone call with David regarding alleged policy violations and potential punishments.	700.00	0.7	490.00
05/03/2017	AEP	Approval of Settlement	Conference with attorney Szumiak re: Board's approval of memorandum of understanding, and need to draft settlement agreement and motion for approval of settlement [0.2]. Conference with attorney Garrison re: same [0.2]. Begin drafting joint application to approve settlement [2.4].	500.00	2.8	1,400.00
05/09/2017	AEP	Settlement Administration	Review emails and texts from attorney Richmond re: social worker requests for adjustments of start dates. Create settlement split spreadsheet. Email co-counsel re: requests for adjustment. Conference with attorney Garrison re: same.	500.00	0.8	400.00
05/09/2017	GG	Telephone call	Telephone call with Alex regarding Harmon and Adams.	700.00	0.4	280.00
05/10/2017	MAR	Review declarations	Research declaration issues for conditional certification; review research; discuss with co-counsel; outline points to cover in the declarations; memo to file.	600.00	2.5	1,500.00
05/12/2017	MAR	Calls with Denkin	Calls and emails with Denkin re status of settlement and Board approval of same; discuss with co-counsel; conference with Denkin and co-counsel to discuss settlement terms ; discuss division of settlement funds amongst the class members; memo to file.	600.00	2.5	1,500.00
05/17/2017	MAR	Email with	Emails with re:	600.00	0.4	240.00

05/17/2017	MAR	Emails with Denkin re subpoenas	Emails with Denkin and co-counsel re memo issued by HS on response to subpoenas	600.00	0.2	120.00
05/17/2017	MAR	Email with Denkin re deposition location	Email with Denkin re location and time of second deposition	600.00	0.2	120.00
05/17/2017	MAR	Email with Denkin re Young memo	Emails and calls with Denkin and co-counsel re Bennett retirement and Young memo re same; review the memo.	600.00	0.3	180.00
05/17/2017	MAR	Email Correspondence	Emails with Denkin re: deposition transcripts.	600.00	0.3	180.00
05/17/2017	MAR	Prepare declaration outline/co-counsel conference	Prepare declaration outlines; review and revise the same; review prior research memo re same; confer with co-counsel re same.	600.00	1.7	1,020.00
05/17/2017	MAR	Opt-in issues	Contact opt-ins re the rights; research the issues; review research and email information to co-counsel.	600.00	1.6	960.00
05/22/2017	AEP	Settlement / Mediation	Review defendant's proposed settlement agreement. Compare to memorandum of understanding and notice of settlement. Comprehensively revise settlement agreement to accurately reflect same. Email all counsel re: settlement, explaining and attaching revised settlement agreement. [5.0] Conferences with attorney Garrison re: defendant's proposed settlement agreement, required revisions, and case strategy. [0.3]	500.00	5.3	2,650.00
05/22/2017	GG	Review	Review proposed settlement agreement and email from Alex regarding the same. Telephone call with Alex.	700.00	0.8	560.00
05/24/2017	AEP	settlement / motion to enforce	Review email from attorney Van Ligten re: defendant's draft settlement agreement. Conferences with attorney Garrison re: same. [0.5] Leave message with attorney Szumiak re: settlement status and plaintiff's intent to file a motion to enforce settlement / re-open. Conference with attorney Van Ligten re: same. [0.2] Draft L.R. 7-3 email to all counsel re: plaintiff's intent to file a motion to enforce settlement / re-open. [1.2]	500.00	1.9	950.00
05/24/2017	GG	Review	Review email from Barbara. Telephone call with Alex regarding same.	700.00	0.3	210.00
05/24/2017	GG	Review	Review email from Alex to Barbara regarding proposed settlement agreement.	700.00	0.3	210.00
05/24/2017	GG	Review	Review responsive email from Barbara to Alex. Telephone call with Alex regarding same.	700.00	0.5	350.00
05/25/2017	AEP	settlement / motion to enforce	Review email from attorney Van Ligten re: settlement, request to meet and confer on motion to enforce settlement or, in the alternative, reopen case. Conference with attorney Garrison re: same. [0.3] Email all counsel re: settlement, request to meet and confer on motion to enforce settlement or, in the alternative, reopen case. [1.8]	500.00	2.1	1,050.00

05/25/2017	GG	Review	Review Alex's changes to proposed settlement agreement.	700.00	0.4	280.00
05/26/2017	AEP	Settlement / Mediation	Prepare for call with all counsel re: settlement. Call with all counsel re: settlement. Follow up call with attorney Garrison re: same.	500.00	0.9	450.00
05/31/2017	GG	Review	Review emails from David. Telephone call with David regarding same.	700.00	0.5	350.00
06/02/2017	GG	Review	Review redlined version of the settlement agreement from County. Telephone call with Alex regarding same.	700.00	0.8	560.00
06/05/2017	AEP	settlement	Review and revise draft settlement agreement from County. Forward to attorneys Garrison and Richmond. Conference with attorney Garrison re: same. Further revise agreement. Forward to all counsel.	500.00	1.7	850.00
06/05/2017	GG	Review	Review Alex email regarding settlement agreement. Telephone call with Alex regarding same.	700.00	0.5	350.00
06/07/2017	AEP	Settlement / Application to Approve Settlement	Conference with attorneys Szumiak and VanLigten re: settlement agreement. [0.2] Conference with attorney Garrison re: same. [0.2] Continue drafting joint application for approval of settlement. [1.0]	500.00	1.4	700.00
06/08/2017	AEP	settlement	Review revised settlement agreement from attorney VanLigten. Email all counsel re: same.	500.00	0.4	200.00
06/08/2017	GG	Review	Review multiple emails between counsel regarding redline settlement agreement.	700.00	0.8	560.00
06/21/2017	AEP	Approval of Settlement	Finish draft of memorandum in support of application to approve FLSA settlement. Forward to co-counsel for review and comment.	500.00	6.6	3,300.00
06/21/2017	GG	Review	Review Joint Application to Approve Settlement Agreement. Telephone call with Alex regarding same.	700.00	0.5	350.00
06/22/2017	AEP	Approval of Settlement	Review and revise memorandum of points and authorities in support of joint application to approve settlement. Research amount of attorney fees in common fund settlements. Draft proposed order and judgment granting application to approve settlement. Conference with attorney Richmond re: class member start dates. Review letters from County's HR department forwarded by attorney Richmond. Email all counsel re: joint application and settlement agreement, attaching draft joint application documents, letter re: start date, and settlement agreement exhibits.	500.00	5.1	2,550.00

06/23/2017	AEP	Approval of Settlement	Draft notice of joint application to approve FLSA settlement, declaration of Alexander E. Papaefthimiou, declaration of Gregory M. Garrison, declaration of Megan A. Richmond, and Notice of Lodgment. Assemble exhibits. Email all counsel re: settlement agreement and joint application, attaching joint application and settlement papers.	500.00	3.9	1,950.00
06/23/2017	GG	Review	Review final Joint Application to Approve Settlement.	700.00	0.5	350.00
06/26/2017	AEP	Motion for Attorney Fees	Begin drafting memorandum of points and authorities in support of motion for attorney fees.	500.00	3.6	1,800.00
06/26/2017	AEP	settlement	Review email from attorney Richmond re: allocation of settlement fund between class members and documents attached to email [0.2]. Draft revised allocation of settlement fund [0.3]. Email co-counsel re: allocation of settlement, attaching revised spreadsheet [0.2]. Conference with attorneys Szumiak and VanLigten re: settlement agreement and joint motion [0.3]. Revise settlement agreement [0.6]. Conference with attorney Garrison re: revisions to settlement agreement [0.2]. Email all counsel, attaching revised settlement agreement [0.1].	500.00	1.9	950.00
06/27/2017	AEP	settlement	Conferences with co-counsel re: revisions to allocations of settlement fund [0.3]. Revise settlement allocation spreadsheet and verify / correct number of weeks worked with online date calculator [0.8]. Email all counsel re: settlement, attaching final agreement with all exhibits [0.1].	500.00	1.2	600.00
07/03/2017	AEP	settlement	Receive and review plaintiff's signature page. Email all counsel re: status of signatures on settlement agreement, attaching plaintiff's signature page.	500.00	0.2	100.00
07/05/2017	AEP	settlement	Review email from attorney Szumiak re: settlement agreement and proposed order granting motion to approve settlement. Revise settlement agreement and review revised proposed order. Email all counsel re: settlement and proposed order, attaching signature page of plaintiff's counsel to settlement agreement.	500.00	0.7	350.00
07/05/2017	MAR	Approval of Settlement	Calls with clients re status on settlement and expected timeline re Board of Supervisors involvement; discuss defense attempts to negotiate attorney fees; discuss class representative issues; memo to file	600.00	1.5	900.00
07/07/2017	AEP	Approval of Settlement	Revise joint application papers for approval of FLSA settlement to be unopposed motion [1.2]. Revise and expand upon unopposed motion for approval of FLSA settlement to include motion for attorney fees and costs [3.8]. Draft declaration of David Denkin [0.6]. Forward to client. Emails to and from client re: declaration [0.2].	500.00	5.8	2,900.00

07/08/2017	AEP	Approval of Settlement	Finish drafting memorandum in support of unopposed motion to approve settlement / attorney fees, declaration of Gregory M. Garrison and declaration of Megan A. Richmond. Forward motion papers to co-counsel for review.	500.00	1.9	950.00
07/09/2017	GG	Draft	Review and revise final Joint Application to Approved Settlement. Draft declarations of Grant Teeple, Ed Chapin and Mike Marrinan ISO of same.	700.00	3.1	2,170.00
07/10/2017	GG	Telephone call	Telephone calls and emails Mike Marrinan, Ed Chapin, Darren Quinn and Grant Teeple. Revise declarations, finalize same. Forward executed declarations to Alex.	700.00	1.8	1,260.00
07/10/2017	AEP	Approval of Settlement	Conferences with attorney Garrison re: revisions to motion to approve settlement and for attorney fees and declarations of Chapin, Merrinan, Teeple and Quinn. [0.6] Revise notice of motion and motion to approve settlement, memorandum of points and authorities, proposed order, declaration of Gregory Garrison, declaration of Megan Richmond, declaration of Alex Papaefthimiou, declaration of David Denkin, and Notice of Lodgment. [2.7]	500.00	3.3	1,650.00
07/16/2017	AEP	Approval of Settlement	Finalize notice of motion and motion to approve settlement, memorandum of points and authorities, proposed order, declaration of Gregory Garrison, declaration of Megan Richmond, declaration of Alex Papaefthimiou, declaration of David Denkin, and Notice of Lodgment. Assemble exhibits to Notice of Lodgment.	500.00	2.4	1,200.00

Totals: **834.3 \$470,820.00**

Time Entry Sub-Total:	470,820.00
<b>Sub-Total:</b>	470,820.00
<b>Total:</b>	470,820.00
<b>Amount Paid:</b>	0.00
<b>Balance Due:</b>	<b>\$470,820.00</b>